

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	In Proceedings Under Chapter 13
	)	Honorable A. Benjamin Goldgar
Shawn M. Hoffmann,	)	
	)	
	)	Case No. 19 B 15819
Debtor.	)	

**NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

**TO: DEBTORS, DEBTORS' COUNSEL, CHAPTER 13 TRUSTEE:**

Please take notice that on January 10, 2020, at 9:30 a.m. or as soon thereafter as the same may be heard, the undersigned will present to the Honorable A. Benjamin Goldgar (or any other judge who may be presiding in his or her place), in Park City Branch Court, Courtroom B, 301 S. Greenleaf Avenue, Park City Illinois, 60085 the attached motion for relief from the automatic stay.

RIEZMAN BERGER, P.C.

**/s/ Kathryn A. Klein**

Kathryn A. Klein, #06199235  
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**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

COMES NOW TD Auto Finance LLC ("TD Auto"), by counsel, respectfully moves for relief from the automatic stay on the following grounds:

1. On the date of the filing of this bankruptcy proceeding, TD Auto was owed at least \$15,961.46, secured by a 2014 Chevrolet Traverse, VIN: 1GNKVGKDXEJ128113. Attached as Exhibits A and B are copies of documents which demonstrate TD Auto's security interest and perfection of the same.
2. Debtors are delinquent in payments to TD Auto to be paid outside of the plan for all payments due and owing since August 9, 2019, in the amount of approximately \$2,442.80.
3. TD Auto is not adequately protected with a continuation of the automatic stay and cause exists for granting relief pursuant to 11 U.S.C. § 362.
4. TD Auto requests that any order modifying the automatic stay be effective immediately as allowed under Federal Bankruptcy Rule 4001(a)(3).

WHEREFORE, TD Auto respectfully requests that the Court lift the automatic stay of 11 U.S.C. § 362 as to the vehicle, that any order modifying the automatic stay be effective immediately as allowed under Federal Bankruptcy Rule 4001(a)(3), and for such further relief as is proper.

Respectfully submitted,

RIEZMAN BERGER, P.C.

**/s/ Kathryn A. Klein**

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Attorneys for TD Auto

**PROOF OF SERVICE**

The undersigned states that I served the Motion for Relief from the Automatic Stay, Notice of said Motion, and proposed Order, all as attached, upon the Debtors by postage prepaid, in the United States Mail, by first-class mail and upon the other parties named below via electronic means, on December 27, 2019.

Shawn M. Hoffmann  
521 Harrisburg Ct.  
Lindenhurst IL 60046

Debtor

David M. Siegel  
790 Chaddick Drive  
Wheeling IL 60090

Attorney for Debtors

Glenn B. Stearns  
801 Warrenville Road, Ste. 650  
Lisle IL 60532

Chapter 13 Trustee

Office of the United States Trustee  
219 S. Dearborn St., Rm. 873  
Chicago, IL 60604

**/s/ Kathryn A. Klein**